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Plaintiff Flightlease Holdings (Guernsey) Limited

Names and addresses of additional counsel appear on the signature pages

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

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FLIGHTLEASE HOLDINGS (GUERNSEY) :	
LIMITED, by its Joint Liquidators :	Case No. 3:05-CV-04182 MHP
Stephen John Akers and Nick Stuart Wood, :	
derivatively and on behalf of Nominal :	
Defendant GATX Flightlease Aircraft :	
Company Limited, :	STIPULATION REQUESTING
	<u>ORDER EXTENDING TIME</u>
Plaintiff, :	
- against - :	The Honorable Marilyn H. Patel
JAMES MORRIS, ALAN M. REINKE, :	
GATX THIRD AIRCRAFT :	
CORPORATION and GATX FINANCIAL :	
CORPORATION, :	
Defendants, :	
- and - :	
GATX FLIGHTLEASE AIRCRAFT :	
COMPANY LIMITED, :	
Nominal Defendant. :	
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Pursuant to Civil Local Rules 6-1(b) and 6-2, Plaintiff Flightlease Holdings
(Guernsey) Limited, by its Joint Liquidators Stephen John Akers and Nick Stuart Wood,
derivatively on behalf of Nominal Defendant GATX Flightlease Aircraft Company Limited, and
Defendants James Morris, Alan M. Reinke, GATX Third Aircraft Corporation, and GATX

1 Financial Corporation (collectively, "Defendants"), respectfully submit this Stipulation requesting
2 an Order extending the time for Plaintiff to respond to Defendants' joint motion to dismiss
3 Plaintiff's Shareholder Derivative Complaint (the "Complaint").

4 WHEREAS, on or about November 22, 2005, the parties entered into a stipulation
5 (the "Stipulation") that extended the time for Defendants to answer or otherwise respond to the
6 Complaint and established a schedule for the briefing of any motion to dismiss the Complaint;
7

8 WHEREAS, on or about January 16, 2006, Defendants jointly moved to dismiss the
9 Complaint;

10 WHEREAS, pursuant to the Stipulation, Plaintiff's papers in opposition to
11 Defendants' motion to dismiss the Complaint were to be filed on or before March 2, 2006;

12 WHEREAS, the parties have agreed to provide Plaintiff with additional time to
13 consider Defendants' motion to dismiss the Complaint and prepare its papers in opposition to the
14 motion;
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16 WHEREAS, the only previous extension in this action was the extension of
17 Defendants' time to answer or otherwise respond to the Complaint, agreed to pursuant to the prior
18 Stipulation; and

19 WHEREAS, the requested extension would require a short adjournment of the oral
20 argument date requested by Defendants in their motion to dismiss the Complaint but would not
21 have any other effect on the schedule in this action because the Court has vacated all other
22 deadlines pending resolution of Defendants' motion to dismiss;
23

24 NOW, THEREFORE, the parties hereby stipulate and agree to the following:

25 1. Plaintiff's opposition to Defendants' motion to dismiss the complaint shall be
26 filed on or before April 17, 2006;

27 2. Defendants' reply papers shall be filed on or before June 9, 2006; and
28

1 3. Defendants' motion to dismiss shall be presented to the Court for oral
2 argument on June 26, 2006, at 2:00 p.m., or as soon thereafter as the matter may be heard by the
3 Court.

4 IT IS SO STIPULATED AND AGREED.
5

6 Dated: March 24, 2006

SKADDEN, ARPS, SLATE
MEAGHER & FLOM, LLP

8 By: /s/ Kurt Ramlo

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1 Dated: March 24, 2006

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11 Attorneys for Defendants GATX Third

12 Aircraft Corporation and GATX Financial

13 Corporation

14 ***With Express Authorization**

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1 Dated: March 24, 2006

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7 Attorneys for Defendants James Morris
8 and Alan M. Reinke and Nominal Defendant
9 GATX Flightlease Aircraft Company Ltd.

10 ***With Express Authorization**

11 * I, Kurt Ramlo, attest that Michael A. Zwibelman and Charles C. Read have read and approved
12 the Stipulation Requesting Order Extending Time and consent to its filing in this action.

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21 PURSUANT TO STIPULATION, IT IS SO ORDERED,

22 this 28 day of March, 2006.

23
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25 The Honorable
United States District Judge

